

## **Guidelines for the handling and archiving of personal data for Smålands Nation in Lund**

These guidelines describe how Smålands Nation handles and archives personal data in its operations and in social events in accordance with the GDPR. The guideline also regulates who is responsible for handling and archiving personal data, as well as when and how this data is used. The guideline regulates all of Smålands Nation's activities, and must be easily accessible to members and people who sign up for one of Smålands Nation's events.

### **Definitions**

GDPR - The personal data law.

Personal data - All information that can be linked to a person, for example name, address, social security number or pictures.

Processing - Everything you do with the personal data you have, including storing them.

Personal data controller (PdC) - The person who decides on the purposes and means for the processing of personal data.

Personal data assistant (PdA) - The person who processes personal data on behalf of personal data controller.

Personal data processor agreement - Agreement between personal data controller and personal data processor which essentially regulates how the personal data processor may process the data.

### **GDPR**

The General Data Protection Regulation (GDPR) applies since 25 May 2018, and replaces the Personal Data Protection Act (PUL). The law regulates the processing of personal data and is technology neutral, which means it applies to data in all forms, e.g. in running text, digitally and on paper.

In accordance with the GDPR, personal data may be stored in case of:

- Agreements, when the personal data is necessary to fulfill an agreement.
- Legitimate interest, as the storage is a well-motivated interest for the organization.
- Legal obligations, as the storage is necessary to comply with other laws.
- Protection of the individual's vital interests, e.g. in case of risk to life or health.
- General interest, e.g. authorities' work or review thereof.
- Consent, which must be informed and possible to withdraw.

Follow-up of the processing of personal data must take place regularly, and this follow-up must be documented. These follow-ups are the responsibility of the data controller.

## **Personal data controller**

The board is the nation's body that decides which personal data is to be collected and what it is to be used for. So it is the board that is responsible for personal data in the sense of the law. All questions concerning the processing of personal data must be directed to the board.

## **Member register**

Smålands Nation uses the Terminräkningföreningen's (TRF) membership system, which is regulated by agreements between the unions, the nations and the Academic Association (Akademiska Föreningen - AF). Students become members of Smålands by paying a membership fee to TRF, and by paying the members approve that Smålands Nation can handle their membership data.

A person who does not study at Lund University can become a support member of Smålands Nation without using TRF's membership system (Smålands Nation's own membership register). By paying, the support members agree that Smålands Nation can handle their membership data. In that case, personal data is saved for 5 years. The same personal data is handled through TRF's membership system and through Småland nation's own membership register.

Through TRF's membership system, Smålands Nation gets access to the following information:

- Name
- Social security number
- Address
- Email address
- Telephone number (optional)
- Member ID (if TRF's membership system is used)
- Membership fees
- Member history

Smålands nation's administration has the right to access the membership register in order to manage the day-to-day operations and can also change individuals' personal data in the system upon presentation of identification. The legal basis for this processing of personal data is legitimate interest and agreement.

## **Protocols**

The activities of the student nations are of public interest, which justifies the collection of personal data that results in protocols from Smålands Nation's various decision-making bodies.

Data collected through protocols:

- Name
- Social security number (when needed for special protocols)

Minutes are there to document what the meeting participants say, and this can sometimes mean that information about e.g. health (what is said at so-called "mårdunor") or expressed opinions on various issues are recorded. Certain information about health affects the operations of entire nations, e.g. information on sick leave of paid persons, and therefore needs to be documented in minutes. Legal basis for this processing is an activity of public interest.

## **Registration lists**

Before certain events, Smålands Nation needs to make temporary records of personal data of the people who will participate in the event. The registration lists are used to be able to administer who participates in the event, which food is to be purchased, etc. The registration lists are created using Google forms, digitally archived on Google Drive for two years and then deleted continuously. These Google forms must be linked to Smålands Nation's official email addresses (@smalands.org), as data collected in the nation's name must be collected through the nation's channels.

Data that can be collected through notification lists:

- Name
- Email address
- Social security number
- Telephone number
- Food preferences

The legal basis for this processing of personal data is agreement and legitimate interest.

## **Election committee**

Smålands nation is a democratically structured organization, where the nation is the highest decision-making body. The election to the election committee is prepared by the board and managed by the nation meeting. The election to other positions of trust is prepared by the election committee and is decided by the nation meeting. The election committee and the board collect the following personal data about the candidates via official email addresses (@smalands.org)

- Name
- Email address
- Social security number
- Telephone number
- Previous involvement in and outside the nation
- Interviews about the nation's activities

During the election period, the election committee publishes, through the nation's channels, the names of the candidates, previous involvement in and outside the nation and opinions about the nation's activities.

Information that the election committee collected about candidates is archived digitally for three years and is then deleted on an ongoing basis. The voting record is archived digitally and physically until the next regular election, after which it must be deleted.

The legal basis for this processing of personal data is the agreement with the candidates and legitimate interest.

## **Pictures**

Smålands nation takes pictures at many of its social events, and the participants of the event must be informed of this. The pictures may be published on the website [www.smalands.org](http://www.smalands.org) or on one of the nation's channels on social media. If an individual has submitted a picture and wishes said picture to be taken down, the person can contact the nation agents or the board, and the picture will be taken down immediately.

The legal basis for this processing of personal data is legitimate interest.

## **Archiving**

Smålands nation has two types of archiving: digital and physical. Physical archiving takes place and is organized in binders, and digital archiving takes place via the cloud services Dropbox, MEGA and Google Drive.

All protocols and documents from decision-making bodies within Smålands nation must be archived both physically and digitally.

This includes, among other things, the nation meetings, the board, the committees and the election committee.

Emails sent to and from the addresses are archived in the email addresses connected to Smålands nation (@smalands.org), because the nation needs to be able to go back and see what contact there was between nation agents and others, e.g. authorities and members, and how various cases have been handled. Having access to the email archive is of legitimate interest for Smålands nation, as it is necessary for those active within the nation to be able to carry out their work.

The legal basis for this processing of personal data is activities of public interest and legitimate interest.